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October 14th, 2020

Honorable Analisa Torres
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Modragon v. Mike Mini Mart and Deli Corp., et al.
20-cv-682

Your Honor,

I represent the Plaintiff in this matter and I write to respectfully request that the Court permit Plaintiff to submit his default motion on or before November 6th, 2020.

As I stated in Plaintiff's last letter motion, the pandemic and the lack of employment opportunities have provoked Mr. Modragon to move to Mexico. Since that move, it has been difficult to talk to him at all let alone send over affidavits to sign or speak through Zoom.

I have not been able to reach Mr. Modragon at his usual number since the last request to adjourn the default. I do not know if that is due to restrictions on Mr. Modragon's access to wi-fi in Mexico or issues with his phone. I will have to send a letter to his last address and reach out to his emergency contact.

At this point, I may have to apply to the Court to withdraw from the case if I cannot reach Mr. Modragon.

If it pleases the Court, the undersigned would respectfully request additional time to coordinate with Mr. Modragon, if possible, to prepare the default motion that has become necessary at this point.

This is the Plaintiff's second request for an extension of time.

/s/Colin Mulholland, Esq.
Colin Mulholland, Esq.

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GRANTED. By **November 6, 2020**, Plaintiff shall file a motion for default judgment consistent with Attachment A to the Court's Individual Rules of Practice in Civil Cases.

SO ORDERED.

Dated: October 14, 2020
New York, New York



ANALISA TORRES
United States District Judge